REMARKS

This paper is submitted in reply to the Final Office Action dated March 27, 2007, within the three-month period for response, and is accompanied by a Request for Continued Examination. Reconsideration and allowance of all pending claims are respectfully requested.

In the subject Office Action, claims 1-7 and 16-27 were finally rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 7,047,257 to Fletcher et al.

Applicants respectfully traverse the Examiner's rejections to the extent that they are maintained. Applicants have amended claims 1, 16, 21 and 22 herein, and Applicants respectfully submit that no new matter is being added by the above amendments, as the amendments are fully supported in the specification, drawings and claims as originally filed. Applicants also note that the amendments made herein are being made only for facilitating expeditious prosecution of the aforementioned claimed subject matter. Applicants are not conceding in this application that the originally-claimed subject matter is not patentable over the art cited by the Examiner, and Applicants respectfully reserve the right to pursue this and other subject matter in one or more continuation and/or divisional patent applications.

Now turning to the subject Office Action, and specifically to the art-based rejections, the Examiner will note that all of the independent claims (claims 1, 16, 21 and 22) have been amended to clarify that:

1) the object to which the data structure corresponds is selected from the group consisting of a file and a directory in the filesystem; and

2) the first and second directories are parent directories to the object to which the data structure corresponds

In addition, claim 1 has been amended to clarify that the first and second anchor points are stored in the same data structure, which was already inherently the case in claims 16, 21 and 22. Support for these amendments may be found in claims 2-3, Figs. 10 and 11, and pp.30-32 of the Application as original filed.

As described in the prior response, claim 1 describes in part a data structure for an object that is both (1) the target of links from first and second directories; and (2) the originator of first and second anchor points that reference back to those first and second directories. While other implementations may be envisioned, Fig. 10 illustrates one exemplary implementation in which a data structure 1002 is shown having links 1007, 1009 from first and second directories 1004, 1006, along with first and second anchor points 1010, 1012 that reference the first and second directories 1004, 1006. Of note, directories 1004 and 1006 are parent directories, while the data structure 1002 is a child of each of those parent directories.

The fact that the data structure is the target of links from first and second directories is established in claim 1 via the recitation in the preamble of a "data structure corresponding to an object having a first link from a first directory and a second link from a second directory in a filesystem." The fact that the data structure also is the originator of first and second anchor points that reference back to those first and second directories is established by the recitations in the body of "storing in the data structure a first anchor point that references the first directory," and "storing in the data structure a second anchor point that references the second directory." Both steps refer to the same data structure, and as such the data structure is required to include both such anchor points back to the first and second directories.

In rejecting claim 1, the Examiner relies on Fletcher, and in particular, col. 6, lines 57-67 thereof. Fletcher, however, discloses a method for creating a "custom" filesystem for linking different versions of the same software to the systems that support the particular versions. Fletcher at the most discloses overlaying a custom filesystem that links directories in the custom filesystem to specific directories in another filesystem.

As best shown in Fig. 5, and discussed in the cited passage at col. 6, lines 57-67, Fletcher discloses that a directory in a custom filesystem, such as the "convert" directory or the "draw" directory, can link to a specific directory in another filesystem (e.g., "/main/drawing/draw_1.4/x86/bin" for the "draw" directory). As such, by traversing the custom filesystem a user can ultimately reach the specific directory of interest in the underlying (non-custom) filesystem.

Importantly, however, Fletcher makes no mention of a single object or data structure (i.e. file or directory) that itself points to directories in multiple different filesystem implementations, where those directories themselves point back to the data structure. Put another way, Fletcher does not disclose any single object or data structure that has reciprocal links back and forth with multiple directories in different filesystem implementations. Fletcher only teaches that the objects such as directories can contain a link to the main filesystem (Fletcher, col. 6, lines 57-67). Importantly, however, Fletcher does not disclose any links back from the main filesystem to the custom filesystem.

For example, if the "draw" directory in the custom filesystem shown in Fig. 5 of Fletcher is considered to correspond to an "object" as recited in claim 1, this directory does include a reference to a directory in the main filesystem (e.g., the "/main/drawing/draw_1.4/x86/bin" directory). Furthermore, it can be assumed arguendo that a "dot-dot" link could exist in the "draw" directory back to the parent "drawing" directory in the custom filesystem, arguably corresponding to a reference to the "drawing" directory in a different filesystem from the main filesystem. The Examiner may take the position that these references correspond to the claimed "anchor points;" however, in order to anticipate the claim, Fletcher would additionally need to disclose additional links to the "draw" directory that originate from both of these referenced directories (the "drawings" directory in the custom filesystem and the "/main/drawing/draw_1.4/x86/bin" directory in the main filesystem). A link from the "drawings" directory in the custom filesystem is shown in Fig. 5, but importantly, Fletcher does not disclose any corresponding link from the "/main/drawing/draw_1.4/x86/bin" directory in the main filesystem to the "draw" directory.

If, on the other hand, one of the main filesystem directories (e.g., the "/main/drawing/draw_1.4/x86/bin" directory), was considered to correspond to the "object" of claim 1, that directory might be considered to have links from first and second directories (e.g., the link from the "draw" directory in the custom filesystem and the "drawing" directory in the main filesystem (best shown in Fig. 2). However, that directory does not include multiple anchor points back to the linking directories in the respective filesystems. In particular, even if a "dot-dot" link existed in the

"/main/drawing/draw_1.4/x86/bin" directory back to the "drawing" directory in the main filesystem, Fletcher still does not disclose referencing the "draw" directory in the custom filesystem from the "/main/drawing/draw_1.4/x86/bin" directory in the main filesystem.

In order to anticipate claim 1, Fletcher would need to disclose, at a minimum, an object or data structure that includes links from first and second directories in different filesystem implementations, as well as links back to those first and second directories. Fletcher falls far short of providing the necessary disclosure.

In responding to Applicants' earlier arguments, the Examiner first argues, at pp. 4-5 of the Final Office Action, that despite Applicants arguments that Fletcher does not disclose any single object or data structure that has reciprocal links back and forth with multiple directories in different filesystem implementations, claim 1 does not require a "single object have reciprocal links back and forth with multiple directories." As noted above, however, Applicants have clarified claim 1 to specify that the first and second anchor points are stored in the same data structure. Furthermore, Applicants have clarified claim 1 to specify that the object to which the data structure corresponds is either a file or a directory. While Applicants are of the belief that the claim as originally worded did in fact claim a single object or data structure with reciprocal links back and forth with multiple directories in different filesystem implementations, Applicants submit that claim 1 as amended unquestionably does claim such a data structure.

The Examiner next argues at p. 5 of the Final Office Action that Fletcher discloses, in Fig. 5, a subdirectory "convert" with links to both "/main/drawing/convert_2.2/x86/bin" and "/main/drawing/convert_2.2/bin." The Examiner also argues that the "bin" subdirectories of the aforementioned links are intended to correspond to an "object" as recited in claim 1. The Examiner then argues that Fletcher discloses an object ("bin") with links from first and second directories ("/main/drawing/convert_2.2/x86/bin" and "/main/drawing/convert_2.2/bin") with first and second anchor points to those directories stored in a "/sysname/drawing/convert" directory.

The Examiner's interpretation of Fletcher in this regard, however, is technically inaccurate. First, the Examiner argues that the "/main/drawing/convert_2.2/x86/bin" and

"/main/drawing/convert_2.2/bin" directories are the same "bin" object. As shown in Fig. 3, and as discussed at col. 2, lines 60-67, col. 3, lines 2-5 and col. 7, lines 5-11 of Fletcher, however, the "/main/drawing/convert_2.2/x86/bin" and "/main/drawing/convert_2.2/bin" directories are different directories, with the former storing (processor specific) x86 executable files and the latter storing (non-processor specific) platform independent files. Therefore, to the extent Fletcher discloses "bin" objects, these objects are separate, so any anchor points that might be stored in those objects are stored in separate data structures that correspond to those separate objects.

Second, the Examiner appears to mistakenly consider the links from the "/sysname/drawing/convert" directory to the "/main/drawing/convert_2.2/x86/bin" and "/main/drawing/convert_2.2/bin" directories to correspond to the anchor points recited in claim 1. However, these links, to the extent they are relevant, are in the opposite direction from the claimed anchor points. The links run, if at all, from a parent "convert_2.2" directory to two child "bin" directories, so should either "bin" directory be considered to correspond to a data structure for an object, there is nothing in Fletcher that discloses anchor points that point back to the "convert_2.2" directory.

The Examiner may attempt to analogize the "convert_2.2" directory to the "object to which the data structure corresponds" as recited in claim 1. Claim 1 has been amended, however, to clarify that "the first and second directories are parent directories to the object to which the data structure corresponds." As should be evident from Fig. 5, as well as the naming convention for the "bin" directories, the "convert_2.2" directory is the "parent directory" to the "/main/drawing/convert_2.2/x86/bin" and "/main/drawing/convert_2.2/bin" directories, and not the other way around. Since claim 1 requires that the anchor points in the data structure link to first and second directories that are parent directories of the corresponding object, the "convert_2.2" directory cannot be properly analogized to the "object to which the data structure corresponds" from claim 1.

The Examiner may also attempt to take a broad reading of a "data structure" as encompassing an omnibus data structure containing attributes and links related to multiple objects. Claim 1, however, recites that the data structure corresponds to an

object, and that the object is a file or directory. As such, it would be improper to read the data structure in claim 1 to correspond to multiple files and/or directories.

Applicants therefore respectfully submit that claim 1 is novel over Fletcher, and that the rejection should be withdrawn.

In addition, Applicants submit that claim 1 is non-obvious over Fletcher, as there has been no objective evidence presented that would motivate one of ordinary skill in the art to modify Fletcher to incorporate reciprocal links between an object or data structure and multiple directories in multiple filesystem implementations. In fact, Fletcher itself teaches away from such a modification, as Fletcher notes at col. 4, lines 65-67 that "[b]ecause the custom filenames are linked to the main filesystem, no special tools or modifications to the main filesystem are required." The addition of a link back from any object in a main filesystem to a custom filesystem, as disclosed in Fletcher, would necessarily require a modification to the main filesystem. Accordingly, Applicants submit that one of ordinary skill in the art would not be motivated to modify Fletcher to incorporate the configuration of links and anchor points as recited in claim 1, and therefore, claim 1 is also non-obvious over Fletcher. Reconsideration and allowance of claim 1, and of claims 2-7 that depend therefrom, are therefore respectfully requested.

Next with regard to the rejection of independent claims 16, 20 and 21, each of these claims has been amended in a similar manner to claim 1, and as such, each of these claims is patentable over Fletcher for the same reasons as claim 1. Reconsideration and allowance of claims 16, 20 and 21, and of claims 17-20 and 22-27 that depend therefrom, are therefore respectfully requested.

In summary, Applicants respectfully submit that all pending claims are novel and non-obvious over the prior art of record. Reconsideration and allowance of all pending claims are therefore respectfully requested. If the Examiner has any questions regarding the foregoing, or which might otherwise further this case onto allowance, the Examiner may contact the undersigned at (513) 241-2324. Moreover, if any other charges or credits

are necessary to complete this communication, please apply them to Deposit Account 23-3000.

Respectfully submitted,

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Date

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